

SHER TREMONTE LLP

April 18, 2025

**BY ECF**

The Honorable Jennifer L. Rochon  
United States District Judge  
500 Pearl Street  
New York, NY 10007

**Re: *Doe v. Combs, et. al.*, Case No. 25-cv-00996 (JLR)**

Dear Judge Rochon:

We write on behalf of our clients, Defendants Sean Combs, Bad Boy Entertainment LLC, Bad Boy Entertainment Holdings, Inc., Bad Boy Productions Holdings, Inc., and Bad Boy Books Holdings, Inc. (the “Combs Defendants”), and with the consent of all parties, pursuant to Rule 1(F) of the Court’s Individual Rules of Practice in Civil Cases, to respectfully request an adjournment of the Initial Pretrial Conference and the related deadline for proposing a Civil Case Management Plan and Scheduling Order, and to extend the briefing schedule for Defendants’ forthcoming motions to dismiss (the “Motions to Dismiss”).

Pursuant to the Court’s order dated February 5, 2025 (ECF No. 4), the Initial Pretrial Conference is scheduled for April 30, 2025, with an April 20, 2025 deadline for a joint letter and proposed Civil Case Management Plan and Scheduling Order. Defendants’ deadline to respond to the Complaint is May 12, 2025 (ECF Nos. 14, 25) and Defendants intend to file Motions to Dismiss at that time. The current briefing schedule for the Motions to Dismiss is: Motions to Dismiss to be filed by May 12, 2025; Plaintiff’s Opposition to be filed by May 26, 2025; and Defendants’ Reply, if any, to be filed by June 2, 2025. *See* ECF No. 25. The parties have met and conferred and agreed that, in light of Defendants’ anticipated Motions to Dismiss the Complaint, an Initial Pretrial Conference on April 30, 2025 would not be productive. Accordingly, we respectfully request, with consent of all parties, that that the Initial Pretrial Conference be adjourned to a date after the Motions to Dismiss are resolved and the corresponding deadline to submit a Civil Case Management Plan and Scheduling Order likewise be adjourned accordingly.

The parties have also met and conferred concerning the briefing schedule for the Motions to Dismiss. In light of the nature of the Complaint, intervening deadlines in other matters, and counsels’ vacation schedules, we respectfully request with consent of all parties, to maintain the May 12, 2025 deadline for Defendants’ Motions to Dismiss, but to extend Plaintiff’s time to oppose until June 16, 2025, and to extend the Defendants’ time to reply until July 14, 2025. No prior request for this relief has been made.

We thank the Court for its consideration.

Hon. Jennifer L. Rochon

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Respectfully submitted,


*/s/ Erica A. Wolff*

Erica A. Wolff

The initial pre-trial conference presently scheduled for April 30, 2025 shall be adjourned pending a final determination on Defendants' forthcoming motion to dismiss. The parties' request for an extension of the briefing schedule is GRANTED. Plaintiff's time to oppose the motion shall be extended until June 16, 2025, and Defendants shall file a reply, if any, by July 14, 2025.

Dated: April 18, 2025  
New York, New York

**SO ORDERED.**

  
**JENNIFER L. ROCHON**  
**United States District Judge**